

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Application Number : 09/541,197 Confirmation No.: 4910
Applicant : Jerome Golden
Filed : April 3, 2000
Title : SYSTEM AND METHOD FOR PROVIDING SECURE
RETIREMENT BENEFITS VIA A CONVERSION PROCESS
TC/Art Unit : 3692
Examiner: : Siegfried Chencinski

Docket No. : 22406.000014
Customer No. : **21967**

MAIL STOP AMENDMENT

Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

***SUPPLEMENTAL RESPONSE AND
SUBMISSION OF DECLARATION UNDER 37 C.F.R. §1.132***

Sir:

A. Submission of Declaration

Further to the Examiner's Interview conducted on January 16, 2007, Applicant submits the attached Declaration under 37 C.F.R. §1.132 of Mr. Jerome Golden, the inventor of the subject matter disclosed and claimed in the present application.

1. In his Declaration, Mr. Golden explains why, in his opinion, the invention as disclosed and claimed in the present application was not known in the art at the time the invention was made. Mr. Golden also provides background information regarding his experience and expertise in the field and describes the other well recognized indicia of the non-obviousness of an invention, such as commercial success, industry acceptance and the lack of any products with similar features and benefits.

2. On January 10, 2007 the Applicant faxed draft claims to the Examiner to be discussed as proposed amendments in the Examiner's Interview conducted on January 16, 2007. Those claim amendments together with the attached declaration demonstrate that the "individual, personal actuarial valuation of the benefit and a market value" was not disclosed by actuarial valuations known to a person of ordinary skill in the art at the time the invention was made. A general actuarial valuation of an annuity, for example, used to determine the liability of the company issuing the annuity using factors established when the annuity is issued, is not a recognition or disclosure of an "individual, personal actuarial valuation of the benefit." Other elements as discussed in prior responses also provide important distinctions between what was known to a person of ordinary skill in the art at the time of invention was made and the claims presented by the draft amendments submitted to the Examiner.

Applicant respectfully requests that this Declaration be considered in conjunction with the draft amendments.


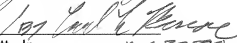
B. Request for Allowance

For all the reasons set forth above, and in the Declaration, Applicant submits that all claims are in condition for allowance, an indication of which is solicited. In the event any outstanding issues remain, Applicant would appreciate the courtesy of a telephone call to their undersigned counsel to resolve such issues in an expeditious manner and place all claims in condition for allowance.

No fee is believed necessary in connection with this submission. However, if it is determined otherwise, the Director is hereby authorized to charge any fee deemed necessary or credit any overpayment to the undersigned's Deposit Account No. 50-0206.

Respectfully submitted,

HUNTON & WILLIAMS LLP

By: 

Thomas J. Scott, Jr.
Registration No 27,836

Dated: February 1, 2007

Hunton & Williams LLP
Intellectual Property Department
1900 K Street, N.W.
Suite 1200
Washington, DC 20006-1109
(202) 955-1500 (telephone)
(202) 778-2201 (facsimile)